

Exhibit 4

1
2 UNITED STATES DISTRICT COURT

3 SOUTHERN DISTRICT OF NEW YORK

4 -----
5 SPENCER MEYER, individually and on
6 behalf of those similarly situated,

7 Plaintiffs,

8 vs. 1:15 Civ. 9796 (JSR)

9 TRAVIS KALANICK,

10 Defendant.
11 -----

12
13 DEPOSITION OF TODD EGELAND

14
15 Wednesday, June 15, 2016

16 9:06 a.m.
17
18
19
20
21

22 Reported by:

23 Joan Ferrara, RPR, RMR, CRR

24 Job No. 174300
25

June 15, 2016

9:06 a.m.

New York, New York

Deposition of TODD EGELAND, held
at the offices of McKool Smith, One Bryant
Park Avenue, New York, New York, pursuant
to Notice, before Joan Ferrara, a
Registered Professional and Merit Reporter
and Notary Public of the State of New York.

1 T. Egeland

2 Q. Which I think you just mentioned.

3 What does light touch
4 reputational due diligence mean?

5 A. I wrote light touch to mean we're
6 going to go out and not ask -- we're going
7 to ask open-ended questions that would
8 protect the client's identity and just not
9 be directing -- not asking leading
10 questions or asking, you know, has this
11 person done anything wrong -- you know,
12 asking derogatory questions.

13 The light touch means we just go
14 out, say do you know this person, what do
15 you think of this person. We get what we
16 get. We don't -- we don't have questions
17 that go down paths.

18 And again, most of that is to
19 ensure that -- you know, in theory, at
20 least, that we're protecting the client's
21 identity.

22 Q. Protecting the client's identity
23 was important to Mr. Henley?

24 A. Well, when he said sensitive
25 under the radar, I took it to mean that,